

Apr 23, 2025

s/ JDH

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Eduardo Flores-Ruiz

DOB: (XX/XX/1994)

Case No.

25-M-395 (SCD)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 18, 2025 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1326(a)(2)

Reentry of Removed Alien

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.JEREMY M
SCHULTZDigitally signed by
JEREMY M SCHULTZ

Date: 2025.04.23

14:27:35 -05'00'

Complainant's signature

Jeremy Schultz, Deportation Officer, ICE ERO

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1Date: 4-23-25City and state: Milwaukee, Wisconsin

Stephen C. Dries

Judge's signature

Stephen C. Dries, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Jeremy M. Schultz, Deportation Officer, being duly sworn and under oath state the following:

1. I am a duly appointed Deportation Officer with the United States Department of Homeland Security (“DHS”), Immigration and Customs Enforcement, Enforcement and Removal Operations (“ICE ERO”). I have been employed with DHS, since August of 2011, first as a Border Patrol Agent and more recently as a Deportation Officer (since March of 2022). In February of 2012, I graduated from the Border Patrol Basic Academy located at the Federal Law Enforcement Training Center in Artesia, New Mexico, where I was trained in immigration laws, policies, and procedures. In March 2022, I transferred from the U.S. Border Patrol to ICE ERO. I attended the Deportation Officer Transition Program from April 2022 through May 2022.

2. In my employment, I am assigned to investigate alleged violations of the Immigration and Nationality Act, including violations that constitute the unlawful re-entry into the United States by deported aliens in violation of 8 U.S.C. § 1326(a)(2) (reentry of removed aliens).

3. This affidavit is made in support of the issuance of a criminal complaint and arrest warrant against Eduardo FLORES-Ruiz (“FLORES-Ruiz”) DOB: 05/XX/1994. All of the information contained herein is based upon my personal knowledge and investigation or upon information supplied to me by other law enforcement officers or citizen witnesses, all of whom I believe to be truthful and reliable.

4. I currently have possession of FLORES-Ruiz's Alien Registration File ("A-File"), # A205 583 354. The A-File is a collection of an alien's history maintained by the United States government. The file includes but is not limited to applications for residency, notice and orders of removal, warrant of deportations, fingerprints, photographs, and criminal history.

5. A review of A-File # A205 583 354 indicates that FLORES-Ruiz is a native and citizen of Mexico. Records document that FLORES-Ruiz was issued an I-860 Notice and Order of Expedited Removal by United States Border Patrol Agents in Nogales, Arizona, on January 16, 2013. FLORES-Ruiz was thereafter physically removed from the United States to Mexico on the same date, through the Nogales, Arizona, Port of Entry. There is no evidence in # A205 583 354 or DHS indices indicating that FLORES-Ruiz ever sought or obtained permission to return to the United States.

6. On March 28, 2025, the Milwaukee ICE ERO Office was informed that FLORES-Ruiz, who was charged in Milwaukee County Case Number 2025CM000814 with three counts of Battery-Domestic Abuse-Infliction of Physical Pain or Injury, was scheduled to appear for a pretrial conference on April 18, 2025.

7. FLORES-Ruiz's fingerprints and photographs were taken by the Milwaukee County Jail and electronically submitted to federal databases including IAFIS and IDENT. The Milwaukee ICE ERO Office determined through biometric fingerprint comparison that the fingerprints taken of the individual charged in Milwaukee County Case Number 2025CM000814 is the same individual to which # A205 583 354 related

and who had previously been ordered removed from the United States. They were also associated with FBI # 606376TD6.

8. On April 18, 2025, an ICE ERO task force planned to arrest FLORES-Ruiz at the Milwaukee County Courthouse following his scheduled criminal court appearance. They observed FLORES-Ruiz arrive and enter the courtroom with his attorney. At some point, FLORES-Ruiz apparently learned that ICE ERO intended to arrest him and fled the building. Task force members located FLORES-Ruiz outside the courthouse and approached him. FLORES-Ruiz then ran from the task force members and was eventually apprehended a short distance away.

9. Based on the foregoing, I submit that there is probable cause to believe that FLORES-Ruiz is now in the United States without lawful authority, after being previously removed from the United States, in violation of Title 8, United States Code, Section 1326(a)(2).